

**Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.**

In the Matter of)	
)	
Modernizing the FCC Form 477 Data Program)	WC Docket No. 11-10

**INITIAL COMMENTS OF
LIGHTOWER FIBER NETWORKS**

David L. Mayer
EVP, General Counsel & Secretary
Fernanda H. Biehl
Senior Director, Regulatory Affairs
Lightower
Telephone: (703) 434-8533
Email: fbiehl@lightower.com

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I. INTRODUCTION

Lightower Fiber Networks I, LLC, Lightower Fiber Networks II, LLC, and Fiber Technologies Networks, L.L.C. (collectively, “Lightower”) are competitive providers of fiber network services that serve enterprise, government, carrier and data center customers. Lightower has over 17 years of experience providing all-fiber solutions to its customers, and its network consists of approximately 30,000 route miles, providing access to over 20,000 service locations in the Northeast, Mid-Atlantic and Midwest. Lightower extends its network by approximately 2,000 route miles per year.

Lightower appreciates the opportunity to submit the comments offered herein, and the Commission’s initiation of this docket.

II. COMMENTS ON PROPOSED BROADBAND DEPLOYMENT REPORTING MODIFICATIONS

A. FIXED SERVICES (NOTICE, SECTION III.B.)

- i. The Commission Should Not Require Fixed Broadband Providers to Report Whether Total Number of Customers Could be Increased in Each Census Block Listed as It Would Be Burdensome (Notice, Section III.B.1.b., ¶¶34-35)**

The Commission seeks comment on whether it should require fixed broadband providers to indicate if the total numbers of customers in each census block reported could be increased

when reporting deployment data¹, and whether this proposal would require providers to implement a new system for collecting that information.²

It would be very difficult for Lightower to submit data indicating whether the total number of customers could be increased in each census block it serves. Lightower does not maintain data of this type and does not believe it is readily available.

It is also a complex process to determine whether Lightower could serve additional customers in the census blocks it serves. Lightower does not have fiber at every location in any census block. In determining whether to extend its network to a building not then reached by its fiber Lightower looks at the economics of each particular opportunity including the revenue opportunity and the cost of building network, the building access fees, pole attachment or conduit fees and right-of-way fees. It is often a complex process that also takes the availability and allocation of capital into account. As a result, it is not a simple matter to estimate whether and to what extent additional customers could be served in a given census block. In light of the complexity and subjectivity of the determination Lightower believes that it would be burdensome to have to attempt to provide this information, and of minimal value to the Commission.

¹ *In the Matter of Modernizing the FCC Form 477 Data Program*, WC Docket No. 11-10, Further Notice of Proposed Rulemaking, at ¶34 (rel. August 4, 2017).

² *Id.* at ¶35.

ii. The Commission Should Not Require Broadband Providers to Report Deployment Data with Network Coverage Area in Geospatial Format or in Another Single Reporting Methodology, Particularly if Not Compatible with Provider's Mapping System (Notice, Section III.B.1.c., ¶38)

The Commission seeks comments on whether it should give providers the option of reporting broadband deployment data showing network coverage area in geospatial data format or another single reporting methodology if geospatial coverage data is unattainable.³

A single methodology to report broadband deployment would limit the reporting options for providers and result in undue burden if not compatible with the mapping system providers currently use to store data.

Lightower stores the location of its fiber plant in a particular mapping system. To report deployment data, it runs an algorithm to identify each census block where it owns fiber and create a comma-separated values file.

To change the reporting system to a single reporting methodology not compatible with that mapping system would be extremely burdensome as it would require Lightower to dedicate resources to implement a new mapping system.

However, if reporting broadband deployment as geospatial data or another methodology is optional and providers are allowed to continue to report under their current mapping system, Lightower does not oppose requiring network coverage maps.

³*Id.* at ¶38.

iii. The Commission Should Not Increase Granularity For Broadband

Deployment Data Collection (Notice, Section III.B.1.c., ¶¶39-43)

The Commission seeks comments on whether it should require broadband deployment data collection at a level more granular than the census-block level⁴.

Sub-census-block level reporting would materially increase the filing burden because filers would need to implement a system not currently designed to support that level of granularity and spend a large amount of time correcting data errors.

Many providers, especially small and mid-sized providers, would have to sacrifice resources currently dedicated to advancing broadband deployment to implement a new system to report more granular data, which would ultimately impact their ability to expand their footprint.

Sub-census-block level, including blocks, street-level or street-segment, would result in widespread errors due to a multitude of variables in street names and groups of streets. Reporting at this level of granularity for every location where service is available and network is obtainable would substantially increase the volume of data collection and exponentially increase the complexity of filings and data errors.

As a result, increasing granularity would not only overly burden filers, but also produce inconsistent and inaccurate data submissions which would substantially impair data quality.

⁴ *Id.* at ¶¶39-43.

B. OTHER ISSUES (NOTICE, SECTION III. C.)

i. Filing Frequency (Notice, Section III. C. 2., ¶56)

The Commission seeks comments on changing the filing frequency requirement of the FCC Form 477 from semi-annual to annual.⁵

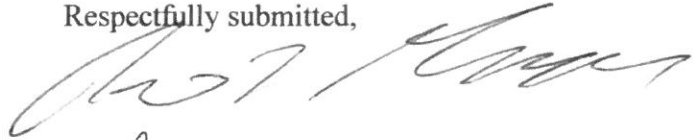
A substantial effort is required to compile and review the data required by Form 477. Decreasing the burden of collecting, analyzing and reporting data to once a year would be beneficial to filers. As a result, Lightower supports changing the filing frequency from semi-annual to annual.

III. CONCLUSION

As discussed *supra*, Lightower disagrees with increasing the level of granularity for reporting broadband deployment data as it would impose a heavy burden on filers. Lightower does not oppose to reporting broadband deployment data in geospatial format or another methodology showing network coverage so long as it is optional and providers are allowed to continue to report under their current mapping system and format. Lightower supports the change of the filing frequency requirement to annual. Lightower thanks the Commission for the opportunity to submit comments in this proceeding.

⁵ *Id.* at ¶56.

Respectfully submitted,



David L. Mayer

Executive Vice President and General Counsel

Fernanda H. Biehl

Senior Director, Regulatory Affairs

Lightower Fiber Networks I, LLC, Lightower Fiber

Networks II, LLC and Fiber Technologies

Networks, L.L.C.

196 Van Buren Street

Suite 250

Herndon, VA 20170

Telephone: (703) 434-8533

Email: fbiehl@lightower.com